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May 20, 2008

OUR FILE NO.:

**VIA FACSIMILE:** (212) 805-6390

Honorable William H. Pauley, III  
US Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: United States and Ed Feuer  
Indictment # 07 Cr. 975

Dear Judge Pauley:

Please accept this letter in opposition to the letter of May 12, 2008, wherein the Government requests an in limine motion to prevent cross examination of certain of the government's special agents regarding their character and their reputation for truth and veracity. A complaint filed in Slaey vs. Adams, which has been attached to the letter and provided to the Court, indicates that the agents for the Government may well have executed a warrant and attached items beyond the probable cause described in the underlying Affidavit. The agents caused significant damage and monetary losses to the Plaintiff in Slaey, causing her to lose her business.

The primary issue before the Court is whether or not these agents can be cross-examined regarding this case and regarding their disregard of the guidelines outlined in the warrant and the Affidavit. These questions go straight to the question of whether or not the agents can be trusted and whether or not their testimony is truthful. Certainly it is subject for cross-examination.

Pursuant to Rule 4:02, "evidence which is not relevant is not admissible. " However, evidence regarding the truthfulness of a special agent's testimony is always relevant. Indeed the truthfulness of any witness is always irrelevant, questioned before the Court and is many times the primary question in a case. Is the witness credible or not? That is the fundamental question in this case as in any other case. Therefore it is respectfully requested that the Court allow cross-examination regarding the Slaey vs. Adams issue.

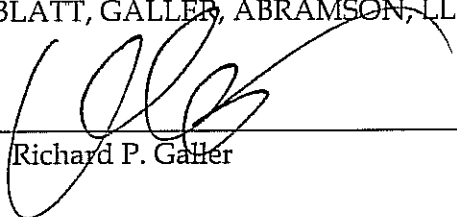
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Thank you for your consideration in this regard.

Respectfully,

KLEEBLATT, GALLER, ABRAMSON, LLC

By: \_\_\_\_\_

  
Richard P. Galler

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